

UNITED STATES DISTRICT COURT
for the
District of Massachusetts

United States of America)
v.)
Kris Bortnovsky, aka "Kris Bort,") Case No.
and Ryan Shapiro) 21-MJ-2826-MBB
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2017 - November 2021 in the county of Suffolk in the
District of Massachusetts, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	Conspiracy to commit securities fraud

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent BJ Kang

Continued on the attached sheet.


Complainant's signature

Special Agent BJ Kang

Printed name and title



Sworn to before me and signed in my presence.

Date: 12/06/2021

City and state: Brookline, MA

Hon. Marianne D. Bowler, U.S. Magistrate Judge

Printed name and title